

EXHIBIT 3

From: Ken Kim
Sent: Friday, October 16, 2020 6:33 PM
To: Barbara Bibas; Acacia Dietz
Cc: ESQ Edward ReBrook; iDS_SINKS-02678
Subject: Re: Sines v Kessler - Discovery

You're very welcome, Acacia! Let us know if you should have any other questions.

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876

Sent from a mobile device. Please excuse brevity and typos.

From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Friday, October 16, 2020 6:30:33 PM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Sines v Kessler - Discovery

[EXTERNAL SENDER]

Thank you for the clarifications Ken. I appreciate your communication and patience during this process.

Thank you,

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

This e-mail message, including all attachments, contains confidential information protected by the attorney-client privilege and/or the attorney work-product doctrine. It is intended solely for the use of the addressee. If you have received this message in error, please notify the sender immediately by telephone ([586.696.0385](tel:586.696.0385)) or by electronic mail (acacia.dietz@outlook.com) and delete this message and all copies and backups thereof. Thank you.

From: [Ken Kim](#)
Sent: Friday, October 16, 2020 6:29 PM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [iDS_SINKS-02678](#)
Subject: RE: Sines v Kessler - Discovery

Hi Acacia:

Please see my responses in red below.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



*iDS is a proud Chambers and Partners **Band 2** Ranked eDiscovery provider!*
https://www.chambersandpartners.com/12788/2817/editorial/58/1#22770855_editorial

From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Friday, October 16, 2020 6:25 PM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Sines v Kessler - Discovery

[EXTERNAL SENDER]

Ken –

Thank you – Just for verification, the “A0107 – A0133 (various emails recently collected – highlighted above in green) - produced on or about 8/26/2020 as production volume NSM003” – this was produced to the Plaintiff’s for their review on or about 8-26-2020 – is this correct? **This is correct**

As for the items that iDS is unable to proceed on, I am looking into it, however, as of today we do not have any updated information to provide for those. **Understood**

Is there any update as to the forensic search of Mr. Colucci’s devices? **We are still performing 2nd level forensics investigation – we will provide you with report once completed.**

Thank you

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

This e-mail message, including all attachments, contains confidential information protected by the attorney-client privilege and/or the attorney work-product doctrine. It is intended solely for the use of the addressee. If you have received this message in error, please notify the sender immediately by telephone (586.696.0385) or by electronic mail (acacia.dietz@outlook.com) and delete this message and all copies and backups thereof. Thank you.

From: [Ken Kim](#)

Sent: Friday, October 16, 2020 8:03 AM

To: [Acacia Dietz](#); [Barbara Bibas](#)

Cc: [ESQ Edward ReBrook](#); [iDS SINKS-02678](#)

Subject: RE: Sines v Kessler - Discovery

Hi Acacia:

Please find below excerpt for the NSM collections from the recent status report that was sent out this week:

iDS EID	Defendant	Requested Device/Account	Account User Name if Multiple	Date Device/Account Made Available	Collection Status	iDS
A0054	National Socialist Movement	Bitchute	nsm88media2@protonmail.com	4/30/2019	Collection Completed	Documents F
TBD	National Socialist Movement	BlogTalkRadio Podcast Service	213-943-3765	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further Credentials r
TBD	National Socialist Movement	BlogTalkRadio Podcast Service	516-453-6058	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further - Pas incorrect
A0107	National Socialist Movement	Email	nsm88atlanta@gmail.com	10/18/2019	Collection Completed	Documents F
A0108	National Socialist Movement	Email	nsm88bama@gmail.com	10/18/2019	Collection Completed	Documents F
A0109	National Socialist Movement	Email	nsm88cinci@gmail.com	10/18/2019	Collection Completed	Documents F
A0110	National Socialist Movement	Email	nsm88connecticut@gmail.com	10/18/2019	Collection Completed	Documents F
A0111	National Socialist Movement	Email	nsm88detroit@gmail.com	10/18/2019	Collection Completed	Documents F
A0112	National Socialist Movement	Email	nsm88kansas@gmail.com	10/18/2019	Collection Completed	Documents F
A0113	National Socialist Movement	Email	nsm88michigan@gmail.com	10/18/2019	Collection Completed	Documents F

A0114	National Socialist Movement	Email	nsm88monroe@gmail.com	10/18/2019	Collection Completed	Documents F
A0115	National Socialist Movement	Email	nsm88ny@gmail.com	10/18/2019	Collection Completed	Documents F
A0116	National Socialist Movement	Email	nsm88r5@gmail.com	10/18/2019	Collection Completed	Documents F
A0117	National Socialist Movement	Email	nsm88southflorida@gmail.com	10/18/2019	Collection Completed	No document search terms
A0118	National Socialist Movement	Email	nsm88toledo@gmail.com	10/18/2019	Collection Completed	No document search terms
A0119	National Socialist Movement	Email	nsmalabama88@gmail.com	10/18/2019	Collection Completed	No document search terms
A0120	National Socialist Movement	Email	nsmarkansas@gmail.com	10/18/2019	Collection Completed	No document search terms
A0121	National Socialist Movement	Email	nsmfresno@gmail.com	10/18/2019	Collection Completed	No document search terms
A0122	National Socialist Movement	Email	nsmmaryland@gmail.com	10/18/2019	Collection Completed	No document search terms
A0123	National Socialist Movement	Email	nsmmsst88@gmail.com	10/18/2019	Collection Completed	Documents F
A0124	National Socialist Movement	Email	nsmnc88@gmail.com	10/18/2019	Collection Completed	Documents F
A0125	National Socialist Movement	Email	nsmpor@gmail.com	10/18/2019	Collection Completed	Documents F
A0126	National Socialist Movement	Email	nsmregion4hq@gmail.com	7/7/2020	Collection Completed	Documents F
A0127	National Socialist Movement	Email	nsmvermont@gmail.com	10/18/2019	Collection Completed	Documents F
A0128	National Socialist Movement	Email	nsmwestvirginia@gmail.com	10/18/2019	Collection Completed	Documents F

A0129	National Socialist Movement	Email	r3nsm88@gmail.com	10/18/2019	Collection Completed	Documents P
TBD	National Socialist Movement	Email	chiefstaff@nsm88.org	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials r
TBD	National Socialist Movement	Email	commander@nsm88.org	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password no Defendant st account is In
TBD	National Socialist Movement	Email	commanderburt@nsm88.org	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Pas incorrect
TBD	National Socialist Movement	Email	Minnesota@gmail.com	10/18/2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Pas incorrect
TBD	National Socialist Movement	Email	nsm88ky@gmail.com	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password no Defendant st account is Inactive/Unk
TBD	National Socialist Movement	Email	nsm88utah@gmail.com	10/18/2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Pas incorrect
TBD	National Socialist Movement	Email	nsm88utah@gmail.com	10/18/2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Pas incorrect
TBD	National Socialist Movement	Email	nsm88wyoming@gmail.com	10/18/2019	Collection pending - must bypass 2FA	iDS Cannot Proceed Further - Pas correct but 2 bypassed. A made on 08/ Defendant. V collect again
TBD	National Socialist Movement	Email	nsmambassador@gmail.com	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Pas incorrect
TBD	National Socialist Movement	Email	nsmchiefstagg@gmail.com	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password no Defendant st account is Inactive/Unk

TBD	National Socialist Movement	Email	nsmcolumbus.oh@gmail.com	10/18/2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Good to recognize the address.
TBD	National Socialist Movement	Email	nsmflorida@gmail.com	10/18/2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Password incorrect
TBD	National Socialist Movement	Email	nsmorlando88@gmail.com	10/18/2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Good to recognize the address.
TBD	National Socialist Movement	Email	nsmregion11@gmail.com	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Password not correct. Defendant's account is Inactive/Unknown
TBD	National Socialist Movement	Email	nsmregion9hq@gmail.com	10/18/2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Password incorrect
TBD	National Socialist Movement	Email	nsmssdivision@gmail.com	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Password incorrect
TBD	National Socialist Movement	Facebook		7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Credentials not correct. Defendant's account is Inactive
TBD	National Socialist Movement	Hotline Service	651-659-6307	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - hotlines are not something that can be collected by a consultant
A0105	National Socialist Movement	Laptop	Colucci Aspire 3 Model N17Q2	7/7/2020	Collection Completed	Documents Reviewed
A0104	National Socialist Movement	Mobile Device	Colucci iPhone 11 Pro Max	7/7/2020	Collection Completed	No reviewable data available from device.
TBD	National Socialist Movement	Mobile Device	Colucci iPhone XS Max	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Custodian's statement was returned prior to the final Court Order

TBD	National Socialist Movement	Newsletter Service	Benchmark	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further - Password work
TBD	National Socialist Movement	Newsletter Service	Constant Contact	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials not Defendant's account is In
TBD	National Socialist Movement	Twitter	NSM88	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's never had ac
TBD	National Socialist Movement	Twitter	@ColucciBurt	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials not Custodian pr iDS should al access Twitter signing in usi device. iDS w in but based accessed on t device the Tw appears to b not been cor up. Hence, th for iDS to col
TBD	National Socialist Movement	Vkontakte (VK)	300604375	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's account is In
TBD	National Socialist Movement	Vkontakte (VK)	Burt Colucci	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's account is In
TBD	National Socialist Movement	Website	www.nsm88.org	7/7/2020	Publicly available information was captured previously.	Documents R iDS EID A007 Defendant J. Defendant B he never hac website.
TBD	National Socialist Movement	Yahoo Groups Newsletter Service	nsmworld@yahoogroups.com	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not

						Defendant's account is In
TBD	National Socialist Movement	YouTube	NSM Media	7/7/2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's never had access

You are correct in stating that everything that has been collected by iDS was subsequently produced and released to Plaintiffs as follows:

A0054 (Bitchute) – produced on or about 4/22/2020 as production volume NSM001

A0105 (Colucci Aspire 3 Model N17Q2) - produced on or about 7/14/2020 as production volume NSM002

A0107 – A0133 (various emails recently collected – highlighted above in green) - produced on or about 8/26/2020 as production volume NSM003

However, as you can see from the above status report excerpt, there are many social media and email accounts that iDS has not been able to access for the various reasons provided.

Let us know if you have any questions.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



iDS is a proud Chambers and Partners **Band 2** Ranked eDiscovery provider!
https://www.chambersandpartners.com/12788/2817/editorial/58/1#22770855_editorial

From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Friday, October 16, 2020 2:08 AM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>
Subject: Sines v Kessler - Discovery

[EXTERNAL SENDER]

Ken & Barbara –

The Plaintiffs have stated in a new motion to the court that they are “unable to access the social media and email accounts that NSM has disclosed” -

To my knowledge, everything that has been collected by iDS is available to the Plaintiffs for their review, correct? If so, can you please give me the date that these were made available to the Plaintiffs for their review?

Thank you,

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

This e-mail message, including all attachments, contains confidential information protected by the attorney-client privilege and/or the attorney work-product doctrine. It is intended solely for the use of the addressee. If you have received this message in error, please notify the sender immediately by telephone ([586.696.0385](tel:586.696.0385)) or by electronic mail (acacia.dietz@outlook.com) and delete this message and all copies and backups thereof. Thank you.

INFORMATION CLASSIFICATION NOTICE: This electronic communication (including any attachments) is intended to be viewed only by the individual(s) to whom it is addressed. It may contain information that is privileged, proprietary, confidential and/or protected from disclosure by applicable law. Any disclosure, dissemination, distribution, copying, exporting or other use of this communication or any attached document(s) other than for the purpose intended by the sender is strictly prohibited without prior written permission from the sender. If you have received this communication in error, please notify the sender immediately by reply e-mail and promptly destroy all electronic and printed copies of this communication and any attached documents.

INFORMATION CLASSIFICATION NOTICE: This electronic communication (including any attachments) is intended to be viewed only by the individual(s) to whom it is addressed. It may contain information that is privileged, proprietary, confidential and/or protected from disclosure by applicable law. Any disclosure, dissemination, distribution, copying, exporting or other use of this communication or any attached document(s) other than for the purpose intended by the sender is strictly prohibited without prior written permission from the sender. If you have received this communication in error, please notify the sender immediately by reply e-mail and promptly destroy all electronic and printed copies of this communication and any attached documents.

INFORMATION CLASSIFICATION NOTICE: This electronic communication (including any attachments) is intended to be viewed only by the individual(s) to whom it is addressed. It may contain information that is privileged, proprietary, confidential and/or protected from disclosure by applicable law. Any disclosure, dissemination, distribution, copying, exporting or other use of this communication or any attached document(s) other than for the purpose intended by the sender is strictly prohibited without prior written permission from the sender. If you have received this communication in error, please notify the sender immediately by reply e-mail and promptly destroy all electronic and printed copies of this communication and any attached documents.